

BRIAN J. FOLEY, ATTORNEY AT LAW

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Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARILYN GAYE PIETY FOLEY

Plaintiff

v.

DREXEL UNIVERSITY,

Defendant

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CIVIL ACTION NO.: 22-cv-1777
Before the Hon. Wendy Beetlestone
United States District Judge

Plaintiff's Supplemental Time Log of Hours Spent on Matters After Fee Petition Was Filed
February 14 (ECF #266)

There were four (4) matters, plus this supplemental time log:

1. Follow up with Court re technical issue in filing Fee Petition **0.3 hours**
2. Piety Response (ECF #275) in Opposition to Drexel's Motion for Stay of Execution Without Drexel Having to File Supersedeas Bond (MTS) **15.8 hours (Brian Foley)**
3. Piety Reply (ECF #279) in Support of Piety's Fee and Costs Petition: **23.2 hours (Brian Foley)**
4. Piety Response (ECF #281) in Opposition to Drexel Motion for Post-Trial Relief (DMFPTR) **28.7 hours (Brian Foley)**
5. Supplemental Time Log: **0.8 hours (Brian Foley)**

TOTAL HOURS SINCE FEBRUARY 14: Brian Foley: 68.8 hours

TIME ENTRIES FOR BRIAN FOLEY AND LORRIE McKINLEY:

February 15 and 18 2025

Follow up with Court re technical error in filing fee petition

0.3 hours

TOTAL Follow Up re Tech Error: 0.3 hours

February 26 2025

Review phone message from Maureen McBride, Esq., counsel for Drexel, regarding waiving bond requirement and briefly research issue and write email response to her

0.3 hours

February 27 2025

Review Drexel's MTS and do legal research re extraordinary act of district court letting losing defendant have stay of execution without having to file supersedeas bond – My response is due Sunday

1.3 hours

February 28, 2025

Work on response to Drexel's MTS - response is due Sunday

4.2 hours

March 1, 2025

Work on response to Drexel's MTS response is due tomorrow

3.2 hours

March 2, 2025

Work on response to Drexel's MTS response is due today – finish and file Resonse and Exhibits regarding Drexel's financial woes (inability to pay judgment) and Drexel's retaliation against Piety (unwillingness to pay judgment)

6.8 hours

TOTAL RESPONSE TO MTS: 15.8 hours

March 3 2025

Work on Piety Reply ISO Fee and Costs Petition – review Drexel’s Response

0.8 hours

March 4, 2025

Work on Piety Reply ISO Fee and Costs Petition – several different arguments to address (10 points made), review the cited cases, start research

5.5 hours

March 5, 2025

Work on Piety Reply ISO Fee and Costs Petition

4.4 hours

March 6, 2025

Work on Piety Reply ISO Fee and Costs Petition – **5.1 hours**

March 7, 2025

Work on Piety Reply ISO Fee and Costs Petition – finish and file – inter alia keep within 10 pages as required by Court’s policy

7.4 hours

Lorrie McKinley - review Reply ISO Fee and Costs Petition draft and discuss with Brian Foley

0.8 hours – No Charge

TOTAL REPLY ISO Fee and Costs Petition: 23.2 hours

March 9 2025

Work on Piety Response to Drexel Motion for Post-Trial Relief (DMFPTR) – review the motion, review trial transcript, start research on willfulness

2.3 hours

March 10, 2025

Work on Piety Response to Drexel Motion for Post-Trial Relief (DMFPTR). Inter alia reviewed Drexel's September 30 2024 Motion for Reconsideration and Piety's October 14 2024 Response to Drexel's September 30 2024 Motion for Reconsideration.

2.2 hours

March 11, 2025

Work on Piety Response to Drexel Motion for Post-Trial Relief (DMFPTR) including inter alia research on Drexel's Rule 50 waiver for footnote 1; transcript review

6.5 hours

March 12, 2025

Work on Piety Response to Drexel Motion for Post-Trial Relief (DMFPTR) including inter alia research on Drexel's waiver of "throw away arguments"; transcript review

9.8 hours

March 13, 2025

Finish and file Piety Response to Drexel Motion for Post-Trial Relief (DMFPTR)

7.9 hours

TOTAL Work on Piety Response to Drexel Motion for Post-Trial Relief (DMFPTR): 28.7 hours

March 30, 2025

Review and compile time logs for Supplemental Filing

0.7 hours

March 31, 2025

Review and compile time logs for Supplemental Filing – finish and file

0.1 hours

TOTAL Work on Review and compile time logs for Supplemental Filing: 0.8 hours

Respectfully submitted,

BRIAN J. FOLEY, ATTORNEY AT LAW

/s/ Brian J. Foley

BRIAN J. FOLEY, ESQUIRE

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Attorney for Plaintiff

March 31, 2025

CERTIFICATE OF SERVICE

I, BRIAN J. FOLEY, ESQ., attorney for Plaintiff, Marilyn Gaye Piety Foley, hereby certify that on March 31, 2025 a true and correct copy of the foregoing Reply and exhibits were filed electronically and are available for viewing and downloading from the Court's ECF system and that a notice of electronic filing will be generated to all counsel of record, thereby constituting service of the documents.

/s/ Brian J. Foley